

**THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

MFB Fertility Inc.,

Plaintiff,

v.

Action Care Mobile Veterinary Clinic, LLC,

Defendant.

Case No. 1:23-cv-03854

Dist. Judge John J. Tharp Jr.

Mag. Judge Gabriel A. Fuentes

**JOINT PROPOSED BRIEFING SCHEDULE**

On May 7, 2025, Defendant/Counter-plaintiff Action Care Mobile Veterinary Clinic, LLC (“Action Care”) filed a motion (“Motion”) seeking leave to file a First Amended Answer, Affirmative Defenses, and Counterclaims. [ECF No. 53]. After consultation between the parties’ respective counsel, Action Care and Plaintiff/Counter-defendant MFB Fertility Inc. (“MFB”) have agreed on the following briefing schedule with respect to the Motion:

- MFB’s response brief due by June 4, 2025
- Action Care’s reply brief due by June 18, 2025

The parties jointly request that the Court set the above briefing schedule with respect to the Motion.

Dated: May 8, 2025

Respectfully submitted,

/s/ Ilya G. Zlatkin

Ilya G. Zlatkin  
ZLATKIN CANN ENTERTAINMENT  
4245 North Knox Avenue  
Chicago, IL 60641  
Tel.: (312) 809-8022  
Fax: (312) 809-6918  
ilya@zce.law

*Attorneys for Defendant/Counter-plaintiff,  
Action Care Mobile Veterinary Clinic, LLC*

/s/ Nicholas D. Niro (with permission)

Nicholas D. Niro  
Dean D. Niro  
Arthur A. Gasey  
VITALE, VICKREY, NIRO, SOLON  
& GASEY LLP  
311 S. Wacker Dr., Suite 2200  
Chicago, IL 60606  
Tel.: (312) 236-0733  
Fax: (312) 236-3137  
[nniro@vvnlaw.com](mailto:nniro@vvnlaw.com)  
[dniro@vvnlaw.com](mailto:dniro@vvnlaw.com)  
[gasey@vvnlaw.com](mailto:gasey@vvnlaw.com)

*Attorneys for Plaintiff/Counter-  
defendant, MFB Fertility Inc.*